

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

Stanford L. Burris	:	
	:	
Plaintiff,	:	
	:	Civ. No. 04-1469-SLR
v.	:	
	:	
Richards Paving, Inc.	:	
	:	
Defendant	:	

**NOTICE OF DEPOSITION OF  
PLAINTIFF STANFORD L. BURRIS**

PLEASE TAKE NOTICE that the deposition of Plaintiff STANFORD L. BURRIS will be recorded as follows:

Recorded On :	Wednesday, June 14, 2006 @ 10:00 am
Recorded By :	Matthew P. Donelson, Esq. Elzufon Austin Reardon Tarlov & Mondell
Recorded At :	Law offices of Elzufon Austin Reardon Tarlov & Mondell

300 Delaware Avenue, Suite 1700  
Wilmington, DE 19899

The deposition will be conducted pursuant to the Rules of Civil Procedure adopted by and applicable to the Superior Court of the State of Delaware. This discovery deposition will be recorded by stenographic means.

Duces Tecum

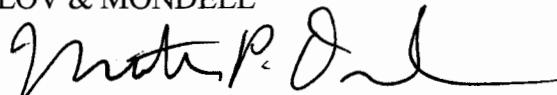
Plaintiff is to bring the following materials to the deposition:

- (1) Any materials studied, reviewed, consulted, referred to, or in any way directly or indirectly relied upon in providing information used in responding to written discovery requests in this litigation.
- (2) Any documents or other materials indicating, referring to, referencing, or discussing any current medical condition or ailment and/or any medical condition or ailment allegedly related to exposure to asbestos.
- (3) Any documents or other materials indicating, referring to, referencing, or discussing any aspect of plaintiff's work history including, but not limited to, lists of employers, places of employment, dates of employment, etc.
- (4) If an economic loss claim is asserted, copies of Federal income tax returns and supporting documentation as filed for the preceding three (3) tax years as well as pension, disability, or other retirement benefit award documentation.

Dated : May 31, 2006

ELZUFON AUSTIN REARDON  
TARLOV & MONDELL

By:



Matthew P. Donelson  
Delaware Bar ID : 4243  
300 Delaware Avenue,  
Suite 1700  
Wilmington, Delaware 19899  
Telephone : 302-234-5900  
Attorney for Defendant  
Richards Paving

CC : Corbett & Associates  
Gary Aber, Esq. (via electronic filing)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

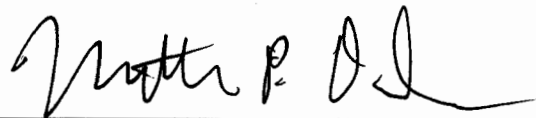
Stanford L. Burris	:	
	:	
Plaintiff,	:	
	:	Civ. No. 04-1469-SLR
v.	:	
	:	
Richards Paving, Inc.	:	
	:	
Defendant	:	

**CERTIFICATE OF ELECTRONIC SERVICE**

I, Matthew P. Donelson, do hereby certify that on this 31st day of May, 2006, I have caused the following documents to be served via e-filing on the parties listed below:

1. Notice of Deposition of Stanford L. Burris;
2. This Certificate of Service.

Gary Aber, Esq.  
Aber, Goldlust, Baker & Over  
702 King Street, Suite 600  
P.O. Box 1675  
Wilmington, DE 19890



MATTHEW P. DONELSON #4243

DATE: May 31, 2006

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